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8 **UNITED STATES DISTRICT COURT**  
9  
10 **DISTRICT OF NEVADA**

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12 PAMELA DITTMAR,  
13 Plaintiff,

14 v.

15 CITY OF NORTH LAS VEGAS, a municipal  
16 corporation,  
17 Defendant.

Case No. 2:17-cv-02916-JAD-BNW

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR PLAINTIFF  
TO FILE HER RESPONSE TO  
MOTION FOR ATTORNEYS' FEES  
[ECF NO. 204]**

*(Third Request)*

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19 NOW COMES the Plaintiff, Pamela Dittmar, by and through her attorneys, Melanie Hill and  
20 Melanie Hill Law PLLC, and Defendant, City of North Las Vegas, by and through its attorneys, R.  
21 Todd Creer, Kaitlin H. Paxton, and Kamer Zucker Abbott, who hereby stipulate that the deadline for  
22 Plaintiff to file her response to Defendant's Motion for Attorneys' Fees [ECF No. 204] be extended  
23 two weeks from the current deadline of April 19, 2024 to May 3, 2024. This stipulation is filed  
24 pursuant to Local Rule IA 6-1.

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1 This is the third request for an extension of this deadline. The first request was due to  
2 counsel's schedule and other case commitments after trial and travel that coincided with the original  
3 deadlines. The second request was due to the parties' participation in the Ninth Circuit mediation  
4 program for the appeal of this case. This third request is also due to the parties continued  
5 participation in the Ninth Circuit mediation program because if the case is resolved it will also  
6 resolve this pending motion. In support of this stipulation for extension of this deadline, the parties  
7 state as follows:

8 1. The current requested deadline for Plaintiff to file her response to Defendant's  
9 Motion for Attorneys' Fees [ECF No. 204] is April 19, 2024. There was a timely motion to continue  
10 the deadline [ECF No. 212] filed on April 5, 2024 that remains pending.

11 2. The parties seek this stipulation of Plaintiff's response deadline to the motion for  
12 attorneys' fees because the parties are in the middle of a Ninth Circuit mediation of the appeal of this  
13 case that will impact the attorneys' fees motion and Plaintiff's need to respond to it in the event the  
14 case is resolved. If the mediation resolves the appeal of this case, it could also moot this motion for  
15 attorneys' fees. For these reasons, as well as the good cause articulated herein, the parties have  
16 stipulated to extend the deadline for Plaintiff to file her response to Defendant's Motion for  
17 Attorneys' Fees [ECF No. 204].

18 3. Based on the foregoing, the parties stipulate to extend Plaintiff's deadline to respond  
19 to Defendant's Motion for Attorneys' Fees [ECF No. 204] for two additional weeks from April 19,  
20 2024 to May 3, 2024.

21 4. This stipulation for an extension of Plaintiff's response deadline is brought in good  
22 faith, establishing good cause, and is not sought for any improper purpose or other purpose of delay.  
23 The parties stipulated to extend the response deadline to provide the parties with sufficient time to  
24 determine if this case can be resolved through the Ninth Circuit mediation program.

25 5. Through this stipulation, the parties request that the Court extend the deadline for  
26 Plaintiff to file her response to Defendant's Motion for Attorneys' Fees from the current deadline of  
27 April 19, 2024 that Plaintiff requested by motion for extension [ECF No. 212] to May 3, 2024.

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WHEREFORE, the parties respectfully request that the Court extend the deadline as stipulated to and requested herein to May 3, 2024.

DATED this 19<sup>th</sup> day of April, 2024.

MELANIE HILL LAW PLLC

KAMER ZUCKER ABBOTT

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**ORDER**

**Because the potential for settlement provides good cause for the requested extension of time, IT IS SO ORDERED.**

4/22/24

**DATE**

  
**UNITED STATES DISTRICT JUDGE**